

THE HONORABLE JOHN C. COUGHENOUR

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

SIERRA CLUB, *et al.*,
Plaintiffs,
v.
BNSF RAILWAY COMPANY,
Defendant.

CASE NO. 2:13-cv-00967-JCC
(consolidated with Case No. 2:14-cv-00660)

JOINT MOTION TO ENTER STIPULATED
PROTECTIVE ORDER

NOTE MOTION ON CALENDAR:
December 21, 2015 (per LCR 7(d)(1))

Pursuant to the Court's October 29, 2014 Order Granting Defendants Protective Order In Part (ECF No. 102) and December 5, 2014 Order Clarifying the Scope of Protective Order (ECF No. 105), Plaintiffs Sierra Club, Puget Soundkeeper Alliance, RE Sources For Sustainable Communities, Columbia Riverkeeper, Friends of the Columbia Gorge, Inc., Spokane Riverkeeper, and Natural Resources Defense Council (collectively, "Plaintiffs") and Defendant BNSF Railway Company ("BNSF"), by and through their undersigned counsel, respectfully jointly move the court to enter the First Amended Stipulated Protective Order marked as Exhibit 1 to this motion.

DATED this 21st day of December, 2015 Respectfully submitted,

BEVERIDGE & DIAMOND PC
s/ Timothy M. Sullivan
Timothy M. Sullivan, WSBA #36183
201 N. Charles Street, Suite 2210
Baltimore, MD 21201

JOINT MOTION TO ENTER FIRST AMENDED
STIPULATED PROTECTIVE ORDER
NO. 2:13-cv-00967-JCC

BEVERIDGE & DIAMOND, P.C.
201 N. Charles St., Suite 2210
Baltimore, MD 21201
410-230-1300

Tel: (410) 230-1355 / Fax: (410) 230-1389
tsullivan@bdlaw.com

Fred R. Wagner (*Pro Hac Vice*)
Richard S. Davis (*Pro Hac Vice*)
W. Parker Moore (*Pro Hac Vice*)
1350 I Street NW, Suite 700
Washington D.C. 20005
Tel: (202) 789-6000 / Fax: (202) 789-6190
fwagner@bdlaw.com
rdavis@bdlaw.com
pmoore@bdlaw.com

YARMUTH WILSDON PLLC
s/Denise L. Ashbaugh
Denise L. Ashbaugh, WSBA #28512
818 Stewart St., Suite 1400
Seattle, WA 98101
Tel: (206) 516-3800 / Fax: (206) 516-3888
dashbaugh@yarmuth.com

Attorneys for Defendant BNSF Railway Company

LAW OFFICES OF CHARLES M. TEBBUTT, P.C.
s/Charles M. Tebbutt
Charles M. Tebbutt (*Pro Hac Vice*)
941 Lawrence St.
Eugene, OR 97401
Tel: (541) 344-3505
charlie@tebbuttlaw.com

SIERRA CLUB ENVIRONMENTAL LAW
PROGRAM
s/Jessica Yarnall Loarie
Jessica Yarnall Loarie (*Pro Hac Vice*)
85 Second St, 2nd Floor
San Francisco, CA 94105
Tel: (415) 977-5636
jessica.yarnall@sierraclub.org

NATURAL RESOURCES DEFENSE COUNCIL
s/David Pettit
David Pettit (*Pro Hac Vice*)
Morgan Wyenn (*Pro Hac Vice*)
1314 Second Street
Santa Monica, CA 90401

JOINT MOTION TO ENTER FIRST AMENDED
STIPULATED PROTECTIVE ORDER
NO. 2:13-cv-00967-JCC

BEVERIDGE & DIAMOND, P.C.
201 N. Charles St., Suite 2210
Baltimore, MD 21201
410-230-1300

1 Tel: (310) 434-2300
2 dpettit@nrdc.org
mwyenn@nrdc.org

3 WESTERN ENVIRONMENTAL LAW CENTER
4 s/Andrea K. Rodgers
5 Andrea K. Rodgers, WSBA #38683
6 Of Counsel
7 3026 NW Esplanade
Seattle, WA 98117
Tel: (206) 696-2851
Rodgers@westernlaw.org

8 *Attorneys for Plaintiffs*
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

CERTIFICATE OF SERVICE

I hereby certify that on December 21, 2015, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record who receive CM/ECF notification at the e-mail addresses below:

Ryan R. Tacorda
rtacorda@bdlaw.com

Counsel for Defendant BNSF

Timothy M. Sullivan
tsullivan@bdlaw.com

Counsel for Defendant BNSF

Fred R. Wagner
Richard S. Davis
W. Parker Moore
fwagner@bdlaw.com
rdavis@bdlaw.com
pmoore@bdlaw.com

Counsel for Defendant BNSF

Denise L. Ashbaugh
dashbaugh@yarmuth.com

Local Counsel for Defendant BNSF

/s/ Sarah A. Matsumoto
Sarah A. Matsumoto
Law Offices of Charles M. Tebbutt